

# EXHIBIT

## 4

**From:** [Richard Schonfeld](#)  
**To:** [Richard Schonfeld](#)  
**Subject:** FW: Smirnov Discovery Request  
**Date:** Monday, November 4, 2024 5:06:22 AM  
**Attachments:** [Proposed Protective Order Stip \(2024.03.05\).pdf](#)  
[Proposed Protective Order \(2024.03.05\).pdf](#)

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**From:** Mulryne, Sean (CRM) <Sean.Mulryne@usdoj.gov>  
**Sent:** Wednesday, March 6, 2024 2:41 PM  
**To:** Richard Schonfeld <rschonfeld@cslawoffice.net>; Wise, Leo (USAMD) <Leo.Wise@usdoj.gov>; DEH (JWPT) <DEH@usdoj.gov>; Rigali, Christopher (NSD) <Christopher.Rigali2@usdoj.gov>  
**Cc:** David Z Chesnoff <dzchesnoff@cslawoffice.net>  
**Subject:** RE: Smirnov Discovery Request

Counsel,

Good afternoon. We received your discovery request. Please see attached a proposed stipulation/joint request for a protective order and a proposed protective order. We are prepared to sign and file these with the Court as soon as possible, barring any objection.

Thank you.

Sean

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**From:** Richard Schonfeld <rschonfeld@cslawoffice.net>  
**Sent:** Tuesday, March 5, 2024 1:37 PM  
**To:** Wise, Leo (USAMD) <lwise@usa.doj.gov>; DEH (JWPT) <DEH@usdoj.gov>; Mulryne, Sean (CRM) <Sean.Mulryne@usdoj.gov>; Rigali, Christopher (NSD) <Christopher.Rigali2@usdoj.gov>  
**Cc:** David Z Chesnoff <dzchesnoff@cslawoffice.net>  
**Subject:** [EXTERNAL] Smirnov Discovery Request

Dear Counsel,

Please find attached our request for discovery in the Smirnov case.

Thank you for your attention to this matter.

Sincerely,

CHESNOFF & SCHONFELD

Richard A. Schonfeld, Esq.

David Z. Chesnoff, Esq.